

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**PEGGY ROIF ROTSTAIN, et al., on
behalf of themselves and all others similarly
situated,**

Plaintiffs,

VS.

**TRUSTMARK NATIONAL BANK, HSBC
BANK, INDEPENDENT BANK F/K/A
BANK OF HOUSTON, SG PRIVATE
BANKING (SUISSE) S.A., and BLAISE
FRIEDLI,**

Defendants.

Case No. 3:09-CV-02384-N

UNOPPOSED MOTION TO INTERVENE

COME NOW Putative Class Plaintiffs Samuel Troice, Punga Punga Financial Limited, Daniel Gomez Ferreiro, Manuel Canabal and others similarly situated, in *Troice, et al. v. Willis of Colorado, Inc., et al.*, No. 3:09-CV-01274-N-BG, Samuel Troice, Pam Reed, Punga Punga Financial Limited and all others similarly situated, in *Troice v. Proskauer Rose, et al.*, No. 3:09-CV-01600-N and Lynne Turk, Individually and as Trustee of the Lynne Caperona Revocable Trust, Susan Blount, and Dale Quisenberry and all other similarly situated, in *Turk, et al. v. Pershing LLC*, No. 3:09-CV-02199-N and file this Unopposed Motion to Intervene, for the limited purpose of responding and objecting to Defendants' Motion to Coordinate Certain Class Certification Issues.

On July 28, 2015, Defendants, The Toronto-Dominion Bank, Trustmark National Bank, HSBC Bank plc, Independent Bank, successor by merger to Bank of Houston, Société Générale Private Banking (Suisse) S.A., and Blaise Friedli (collectively, “Bank Defendants”) filed a

Motion to Consolidate Certain Class Certification issues in this lawsuit (the “Bank Class Action”) with the three putative class actions listed above (the “Willis, Proskauer and Pershing Class Actions”). Clearly, the subject of this Motion directly impacts the rights of the movants and, therefore, the Plaintiffs have an interest in the lawsuit with respect to the Motion to Coordinate.

Accordingly, pursuant to Federal Rule of Civil Procedure 24(a)(2), Plaintiffs respectfully request that the Court grant this Unopposed Motion to Intervene for the limited purpose of filing a response and objection to Defendants’ motion.

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFFS AND
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CERTIFICATE OF SERVICE

On August 18, 2015, I electronically submitted the foregoing document with the clerk of the court of the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

By: /s Edward F. Valdespino
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